

FILED

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MAY 30 2023

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____
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7 In Pro Se
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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

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Aiai Qi) CASE NO.: 2:23-cv-00377-DAD-JDP
) (PS)
)
) MOTION TO ACCEPT THE LATE
) FILED OPPOSITION TO THE
) MOTION TO DISMISS
)
Plaintiff)
v.)
)
Alejandro Mayorkas, Secretary)
Department of Homeland Security)
Ur M. Jaddou, Director, USCIS)
Emilia Bardini, Director,)
San Francisco Asylum Office)
Defendants)

1 Plaintiff inadvertently missed the papers of the proceedings that
2 caused the delay in filing the Opposition. However, considering the fact that
3 she has a sick child to take care of and that she has been waiting for the
4 adjudication of her asylum application for eight year, the Court may excuse
5 the delay and accept the late filed Opposition.

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7 In addition, the grant of this motion will not prejudice the Defendants
8 because they can still argue at the hearing on June 15, 2023.

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12 Respectfully Submitted by
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15 Aiai Qi
16 In Pro Se

17 5/24/23
18 Dated
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1 Case No.: 2:23-cv-00377-DAD-JDP (PS)
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5 Case Name: Qi v. Mayorkas
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8 Declaration
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11 I, Aiai Qi, hereby declare the following:
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15 I am the Plaintiff in the instant case. From early April 2023, I went to Los Angeles
16 because my child was sick. I returned to Sacramento in the middle of May 2023.
17 When I returned I saw the motion to dismiss from the Defendants' attorney, the
18 "Defendants' Reply" and the Court's "Order to Show Cause". It is my fault that
19 causes the delay in response. I am not familiar with the Court's proceedings. I
20 wish the Court would excuse me and accept my late filed Opposition to the motion to
21 dismiss. I will appear at the hearing on June 15, 2023.
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24 I swear, under penalty of perjury under the laws of the United States that the
25 foregoing is true and correct.
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13 Aiai Qi
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15 In Pro se
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5/24/23
13 Dated
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Proof of Service

I, Aiai Qi, hereby certify that on May 24, 2023, I mailed the Defendants a copy of the Plaintiff's Motion to Accept the Late Filed Opposition and its pages at the following address, postage prepaid:

Office of the United States Attorney
501 "I" Street Room 10-100
Sacramento, CA 95814

Aiwei Li 8/24/23
Aiwei Qi